

2:12-CV-1528
In the United States District Court
for the Western District of Pennsylvania
Patricia A. Scott,
Plaintiff,

vs
St Moritz Security
Services Inc,
Defendant.

RECEIVED

OCT 28 2022

CLERK, U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

(1) Patricia A. Scott resides at 1842
Washington Street, #304, Phone Number
412-980-4399, Heidelberg, Pennsylvania
15106.

(2) Saint Moritz Security Services
Inc, Phone Number 412-885-8654,
Corporate Office Address: 4600
Clawton Boulevard, Pittsburgh, PA
15236.

(3) Title 42 U.S. Code 12182 Public
Accommodations Violations.

(4) Defendants (Name) St. Moritz
Security Services, Inc is under,
the laws of the State of Pennsylvania

and has its principal place of business in Pittsburgh.

(5). Violations of Title 42 U.S. Code 12182 of Public accommodations.

(6). Ever since, plaintiff has been confined to her mobilized wheelchair, she has limitations on her physical activities. One time, she made request for public accommodations but the Security Check point guard became extremely hostile toward plaintiff and she threw the Security Check point guard at her.

She was not hurt nor was there any damages done to her wheelchair. Thereafter, she has been denied access to public accommodations because the Security Check point counter top is too high and it is very difficult for her to reach.

from her wheelchair. Plaintiff contacted the downtown sheriff's department. A sheriff's deputy enforced the law for the basket to be lowered but she quickly jerk it away.

Afterwards, she felt discomfort in her body. The unruly security guards began retaliating against Plaintiff. She contacted the downtown sheriff's department again but this time she was informed that the sheriff's department didn't have any jurisdiction over St. Moritz Security Services Inc. He stated that Plaintiff needed an attorney.

Disability Discrimination (i).
7. On August 15, 2022, she entered into the City County Building located at 414 Grant Street, Pittsburgh, PA 15219. Thereafter, when it was her

24

turn she immediately detect bias against a disabled visitor. The security check point counter top is too high for her to place her personal belongings inside of the security basket. Plaintiff made several requests for the on duty security checkpoint guard to please lower the basket to accommodate her but instead, of assisting a senior citizen who is handicapped the security guard made unreasonable demands for plaintiff to reach the basket by herself to put her own items inside of it. The check point security guard was very disrespectful and rude.

Disability Discrimination (ii)

8. Once again, on September 13, 2022, plaintiff entered into the City County Building located at 414 Grant Street, Pittsburgh, PA 15219. After that time, she made a request for public accommodation. The on duty security guard declined to lower the security check basket to help plaintiff place her personal belongings inside of the security checkpoint basket.

Disability Discrimination (iii)

9. One more time, on October 3, 2022, plaintiff entered into the City County Building located at 414 Grant Street, Pittsburgh, PA 15219. The security checkpoint counter top is high and with the basket placed on it plaintiff was physically ^{unable} to place her personal belongings inside of it.

She entreated the security check point guard to give her a helping hand but she refused to let down to her hand reach so she would've placed her personal belongings inside of the security check basket.

10. These disabilities discrimination occurred when plaintiff was physical unable to reach the high security check point basket to place her personal belongings inside of it. And, she wasn't permitted to use ADA customer services lower security basket for disabled person. Also, she was reprimanded and

she was verbally attacked. Not only that, but she is a senior citizen who is handicapped. Likewise, she was also

deprived of using public accommodations. Additionally, she treated differently from visitors that was standing and walking. Plus, she was repeatedly harassed. Furthermore, she was rebuked by the security check points guards. On top of that, Plaintiff was emotional and verbal abused.

Title 42 U.S. Code 12182-
Prohibition of discrimination by
 Public accommodations

11. Pursuant to 42 U.S. Code 12182 (a), (B)
 (a) General Rule, No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the good, services, facilities, privileges, advantages, or accommodation by any person who owns, (leases for leases to), or operates a place of public accommodation.

Pursuant to 42 U.S. Code 12182 -
Prohibition of discrimination by
public accommodation.

(B). Integrated Setting, Good, Services,
facilities, privileges, advantages, and
accommodation shall be afforded to an
individual with a disability in the most
integrated setting appropriate to the needs
of the individual.

Disability Discrimination (i)

12. On August 15, 2022, plaintiff entered
into the City County Building located at
414 Grant Street, Pittsburgh, PA 15219,
Hereafter, when it was her turn she
immediately detect bias against a
disabled visitor. The Security Check
point counter top is high for her to
place her personal belongings
inside of the Security basket.

9

Plaintiff made several requests for the on duty security check point guard to please lower the basket to accommodate her but instead of assisting a senior citizen who is handicapped the security guard made unreasonable demands for plaintiff to reach the basket by herself to put her own items inside of it. The check point security guard was was very disrespectful and rude.

Disability Discrimination (ii)

13. Once again, on September 13, 2022, plaintiff entered into the City County Building located at 414 Grand Street, Pittsburgh, PA 15219. After that time she made a request for public accommodation. The on duty security guard declined to lower the security check basket to help plaintiff place her

10
Personal belongings inside of the
Security check point basket.

Disability Discrimination (iii)

14. One more time, on October 3, 2022, plaintiff entered into the City County Building located at 414 Grant Street, Pittsburgh, PA 15219. The Security check point counter top is high and with the basket placed on it plaintiff was physically unable to place her Personal belongings inside of it.

She entreated the security check point guard to give her a helping hand, but she refused to let it down to her hand reach so she would've placed her personal belongings inside of it. And she wasn't permitted to use ADA Customer Services lower Security basket for a disabled person.

15, Also, she was reprimanded and she was verbally attacked. Not only that, but she is a senior citizen who is handicapped. Likewise, she was also deprived of using public accommodations. Additionally, she was treated differently from visitors that was standing and walking. Plus, she was repeatedly harassed. Furthermore, she was rebuked by the security check point guards. On top of that, plaintiff was emotional and verbally abused.

Age Discrimination

16 Plaintiff is an elderly person. She has a physical impairment. More than that, she was treated unfairly because of her age, which is another violation of Pennsylvania elderly abuse law. She was subject to an adverse age action; that substantially

younger persons was not yelled at nor were they harassed. Plain-
 Uff believe she was sought out from
 which she was deprivation; of using
 public accommodations; that she
 was a qualified wheelchair bound
 customer to use the lower ADA security
 Check point basket to place her person
 or belongings inside of it which she
 was rejected.

Pursuant to U.S. Code 12182
 Prohibition of discrimination by
Public accommodations

17.(a) General Rule
 No individual shall be discriminated against
 on the basis of disability in the full and equal
 enjoyment of the goods, service, facilities,
 privileges, advantages, or accommodation
 of any place of public accommodation
 by any person who owns, leases (or leases
 to), or operates a place of public

accommodation,

(b). Construction

(1). General Prohibition

(A) Activities

(i). Denial of participation

It shall be discriminatory to subject an individual or class of individuals on the basis of disability or disabilities of such individual or class, directly, or through contractual, licensing, or other arrangements with the opportunity to participate in or benefit from a good, service, facility, privilege, advantage, or accommodation that is not equal to that afforded to other individuals.

(iii) Separate benefit,

It shall be discriminatory to provide an individual or class of individuals on the basis of a disability or disabilities

of such individual or class, directly, or through contractual, licensing, or other arrangement with a good, services facility, privilege, advantage, or accommodation that is different or separate from that provided to other individual, unless such action is necessary to provide the individual or class of individuals with good service, facility, privilege, advantage, or accommodation or other opportunity that is as effective as that provided others.

Pray for Relief

Plaintiff seek relief for a lower alternate special design customers services ADA counter top to accommodate wheelchair users to be inside the City County Building located at 414 Grand Street, Pittsburgh, PA 15219.

Plaintiff seek relief for the discriminatory Security Services and Security Check point guards to restrain from there discriminatory prejudicial treatments toward guest with physical impairments.

Conclusion

Accordingly, for all of the foregoing reasons, plaintiff reverently request that this Court grant her pray for relief and such other reliefs that this Court deems to be appropriate in her civil complaint.

Respectfully Submitted

Patricia A. Scott "Prose"

1842 Washington Street #304

Heidelberg, PA 15106

412-980-4399

Dated for October 14, 2022

By: Patricia A. Scott "Prose"